

REMARKS

Applicants respectfully request further examination and reconsideration in view of the above amendments and the arguments set forth fully below. In the Final Office Action mailed October 25, 2007, claims 1-30 have been rejected. In response, the Applicants have submitted the following remarks and amended claim 1. Accordingly, claims 1-30 are still pending. Favorable reconsideration is respectfully requested in view of the amended claim and the remarks below.

Rejections Under 35 U.S.C. §102

Claims 1-3, 7-9, 13-14 and 26 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Publication No. 2004/0111297 to Schoenberg (hereinafter Schoenberg). The Applicants respectfully disagree with this rejection.

The Applicants respectfully submit the following three arguments in attempting to overcome the present Office Action. First, the Applicants respectfully submit that the Examiner is relying upon “....including instructions of creating a description of the document...” and that the Examiner is construing this limitation of the claim incorrectly. In Schoenberg, the instructions are a barcode, wherein the barcode includes only information of who the subject document is referring to (patient), and where the document should be routed. The Schoenberg reference does not include instructions of creating a description of the document, specifically where the instructions of creating a description includes **an actual reflection of the contents of the documents**. In other words, Schoenberg does not teach the ability to include instructions to create a description that includes actual contents from the documents.

In contrast to the teachings of Schoenberg, the system and method of the present application includes a specification that has instructions for creating a description of the document, wherein the specification includes instructions that reflect the content of the documents (present application, paragraph 20). This point is the reference in the claims that includes the document attributes and syntax rules. Further referring to paragraph 20, “when the documents comprise health records, for instance, the specification 120 may include

attributes such as patient name, internal patient ID, patient medical record number, and document type by which an input document 110 could be described.” Therefore, the Applicants respectfully submit that the limitation “...instructions for creating a description of the document based on attributes of the document...” is not taught by Schoenberg as the Schoenberg reference **does not teach the document being based on attributes of the documents** as taught and claimed in the present application.

Secondly, the Applicants respectfully submit that the Schoenberg reference does not teach the specification as taught and claimed in the present application. Specifically, the Applicants point out that the Schoenberg reference includes a token, which the Examiner is relying upon as the specification, that originates in a host server of the Schoenberg system, upon input from a user at a remote location. However, the system and method of the present application includes a specification that originates in the enterprise, or the origination place of the documents. In other words, if the token were a feature of the Schoenberg reference that indeed taught the specification of the present application, then the token would originate with the user and the documents that the user is attempting to input in the Schoenberg reference. Once again, the Applicant respectfully submits that Schoenberg does not teach the specification.

Lastly, in response to the Examiner’s Response to Arguments section that indicated that the instructions on how to create batches from input documents were not included in the claims, the Applicants now point to the independent claim 1 that includes such limitation. While the Applicant believes that the arguments above stand their own, the Applicant further submits that the Schoenberg reference does not teach creating a description of a document and a batch of electronic images of the document based on attributes of the document and the syntax rules for the description, and sending those documents back to a datastore and an enterprise to be indexed according to a description.

The independent claim 1 is directed to a method of integrating a document in a first format into a data store holding documents in a second format, the method comprising: supplying the document in the first format and a specification comprising instructions for creating a description of the document and a batch of electronic images of the document

based on attributes of the document and syntax rules for the description, wherein the attributes include document source information and document content information, and further wherein the specification originates from an enterprise, receiving the batch in the second format, receiving a description of the document generated responsive to the specification, and importing the batch in the second format into the data store responsive to the description. As discussed above, Schoenberg does not teach a specification comprising instructions for creating a description of the document and a batch based on attributes of the document and syntax rules of the description. For at least these reason the independent claim 1 is allowable over the teachings of Schoenberg.

Claims 2-3 and 7 are dependent upon the independent claim 1. As discussed above, the independent claim 1 is allowable over the teachings of Schoenberg. Accordingly, claims 2-3 and 7 are also allowable as being dependent upon an allowable base claim.

As discussed in the Office Action, claims 8-9, 13-14 are for a system for the method claims 1-3 and 7, and are thereby allowable under the same rationale as discussed above with respect to the method claims 1-3 and 7.

As is also stated in the Office Action, claim 26 is for a computer product of method claims 1, and 5-6, and is thereby allowable for the same reasons as discussed above with respect to the independent claim 1. The Applicants wish to point out that while no amendments to claims 8-9, 13-14 and 26 have been made, the Applicants respectfully submit that the arguments included above with respect to claim 1 that pertain to Schoenberg not teaching instructions of creating a description of the document and further not teaching a specification that originates in the enterprise, render these claims allowable over the teachings of Schoenberg.

Rejections Under 35 U.S.C. §103(a)

Claims 4-6, 10-12, 15-25 and 27-30 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Schoenberg as applied to claim 1 above, and further in view of U.S. Patent Publication No. 2004/0215600 to Aridore et al. (hereinafter Aridore).

Because the rejections under 35 U.S.C. §103(a) rely on the Schoenberg reference to teach the same limitations as discussed above with respect to the independent claims 1, 8 and 26, the Applicants respectfully submit that the independent claims 15, 20 and 27 are allowable over the teachings of Schoenberg and Aridore, as the combination of these reference do not include a specification as taught and claimed in the present invention. Therefore, the Applicants respectfully submit that the independent claims 15, 20 and 27 are allowable over the teachings of Schoenberg, Aridore and their combination.

Claims 4-6 and 10-12 are dependent upon the independent claims 1 and 8. As discussed above, the independent claims 1 and 8 are allowable over the teachings of Schoenberg. Accordingly, claims 4-6 and 10-12 are also allowable as being dependent upon an allowable base claim.

Claims 16-19, 21-25 and 28-30 are dependent upon the independent claims 15, 20 and 27. As discussed above, the independent claims 15, 20 and 27 are allowable over the teachings of Schoenberg, Aridore and their combination. Accordingly, claims 16-19, 21-25 and 28-30 are also allowable as being dependent upon an allowable base claim.

For these reasons, Applicants respectfully submit that all of the claims are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, they are encouraged to call the undersigned at 414-271-7590 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,

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